

Marlene H. Dortch, Esq.

Secretary

Federal Communications Commission

45 L Street NE

Washington, DC 20554

RE: Wireless Telecommunications Bureau and Office of Engineering and Technology Seek
Comment on NextNav Petition for Rulemaking – WT Docket No. WT Docket No. 24-240; RM-
11989

Dear Ms. Dortch,

I am writing on behalf of Hearo Technologies, a company dedicated to providing innovative assistive technology solutions to aging and developmental disability communities. Our systems rely heavily on Z-Wave technology, which operates in the 902-928 MHz spectrum, to deliver essential services such as fall detection, medication reminders, and remote monitoring.

Z-Wave's Critical Role in Assistive Technology

Z-Wave has proven to be the most feature-rich, stable, and backward-compatible wireless communication standard available for home automation and assistive technology. The decision to leverage Z-Wave was a deliberate one, rooted in its reliability and interoperability. Unlike other wireless technologies, Z-Wave operates on a frequency band that avoids common household interference, making it uniquely suited for mission-critical applications. Our users—many of whom are elderly or have developmental disabilities—depend on the uninterrupted and precise functionality that Z-Wave provides.

Impact on Vulnerable Populations

The proposal by NextNav to reconfigure the Lower 900 MHz band, if adopted, would have severe implications for the millions of Z-Wave devices currently deployed across the United States. For companies like Hearo, which serve vulnerable populations, this could lead to catastrophic service disruptions. Our clients rely on our systems not just for convenience but for their safety and independence. Any changes that jeopardize the integrity of Z-Wave could directly threaten the well-being of those who depend on our technology to lead safe and independent lives.

The communities we serve require technical solutions that are mature and dependable. The Z-Wave ecosystem has been cultivated over decades, providing a stable platform that continues to evolve while maintaining compatibility with older devices. This backward compatibility is essential for our clients, many of whom cannot afford frequent upgrades or service interruptions.

Economic and Operational Impact

The proposed reconfiguration of the Lower 900 MHz band would also impose significant financial and operational burdens on companies like ours. The costs associated with relocating to a different spectrum band, if even feasible, would be prohibitive. This could lead to increased costs for our customers, who are often on fixed incomes, and could force some small businesses out of the market altogether.

Moreover, the removal of testing requirements and protections against interference, as proposed by NextNav, would undermine the reliability of Z-Wave devices. This would not only impact the millions of devices currently in use but also stifle innovation by introducing uncertainty into the market.

Conclusion

For these reasons, I respectfully urge the Commission to reject NextNav's petition for rulemaking. The current spectrum allocation and protections have fostered a vibrant and growing ecosystem of unlicensed devices that serve millions of Americans. Undermining this innovation by reconfiguring the band or removing critical protections would harm both consumers and the industry.

Thank you for considering our perspective on this critical issue. We hope the Commission will continue to support the technology standards that have made significant advancements in home automation and assistive technology possible.

Respectfully,

Myke Bates
CEO, Co-Founder
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A handwritten signature in black ink, appearing to read 'MBates' with a stylized flourish at the end.